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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

STEVEN DE COSTA, in his)	CIVIL NO. 03-00598 DAE/LEK
representative capacity as)	
Chairperson of the Board of)	DEFENDANT'S MOTION FOR
Trustees of United Public Workers,)	RECONSIDERATION OF
AFSCME Local 646, AFL-CIO,)	FINDINGS OF FACT AND
Mutual Aid Fund Trust, Real Party)	CONCLUSIONS OF LAW FILED
in Interest, United Public Workers,)	MARCH 20, 2008, AND FOR
Local 646, AFL-CIO,)	NEW TRIAL; MEMORANDUM
)	IN SUPPORT; AFFIDAVIT OF
Plaintiff,)	ERIC A. SEITZ; CERTIFICATE
)	OF SERVICE
vs.)	
)	
GARY W. RODRIGUES,)	
)	
Defendant.)	
)	
)	

DEFENDANT'S MOTION FOR RECONSIDERATION OF
FINDINGS OF FACT AND CONCLUSIONS OF LAW FILED
MARCH 20, 2008, AND FOR NEW TRIAL

Defendant GARY W. RODRIGUES (hereinafter "Defendant"), by and through his undersigned attorneys, hereby moves the Court to reconsider its Findings of Fact and Conclusions of Law filed on March 20, 2008, and order a new trial on the grounds its Findings of Fact and Conclusions of Law contain manifest errors of law, and the evidence adduced at trial is not sufficient to determine the amount of damages, if any, to which Plaintiff is entitled.

This motion is brought pursuant to Rules 7, 59, and 60 Federal Rules of Civil Procedure, and Rules 7.1, and 60.1, Local Rules of Practice for the U.S. District Court for the District of Hawaii, inter alia, and is based upon the attached affidavit of counsel and memorandum in support and the records and files herein.

DATED: Honolulu, Hawai'i, March 31, 2008.

/s/ Eric A. Seitz
ERIC A. SEITZ
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